

MO-AG

August 31, 2020

Alexandra Dunn
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
Environmental Protection Agency

Via Email: dunn.alexandra@epa.gov

Dear Assistant Administrator Dunn,


I recently learned EPA intends to wait until the end of October to publish its decision concerning a new conditional registration for dicamba products. The Missouri Agribusiness Association (MO-AG) represents Missouri agribusinesses and our membership includes herbicide manufacturers, seed companies, agronomic retailers and seed dealers. On behalf of the MO-AG, I am writing to encourage you to publish new conditional registration decisions for Engenia, FeXapan and XtendiMax as soon as possible. We would ask that you approve a new label for the continuation of over the top application of dicamba to soybeans and cotton.

Seed companies book seed in September. Seed companies need to know what volumes of different soybeans they need before harvest to secure supply. Dealers will be forced very soon to make decisions for the 2021 soybean crop and are already being asked everyday by their grower customers for answers. If growers do not know what herbicides are registered for use before October, it creates a hardship to them and for all MO-AG members who are a part of the herbicide supply chain. Any delay regarding a decision on dicamba registration hinders our members ability to assist farmers with weed-control options for the coming year.

The Ninth Circuit Court's ruling vacating the registrations for these products has unfortunately added to the uncertainty. While we understand the challenges the agency is facing due to the recent decision of the 9th Circuit Court and the need to take time to address those challenges, we believe the current label restrictions was determined by a good process involving all the states and stakeholders. Dealers have been and are continually trained in the use of these products.

Thank you for your consideration of this important matter.

Sincerely,



Steve Taylor
President/Executive Director

Advocates for the Business of Agriculture

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